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9
10 **UNITED STATES BANKRUPTCY COURT**
11 **DISTRICT OF NEVADA**

12 In re
13 EXECUTIVE PLASTERING, INC.,
14
15 Debtor

Case No. 09-33776-BTB
Chapter 7

Hearing Date: February 3, 2015
Hearing Time: 1:30 p.m.

16 **DECLARATION OF WILLIAM A.**
17 **LEONARD, JR., IN SUPPORT OF**
18 **MOTION FOR AUTHORITY TO**
19 **DESTROY RECORDS AND TO PAY**
20 **FOR SERVICES RENDERED POST-**
21 **PETITION**

22 William A. Leonard, Jr., declares as follows:

23 1. I am the duly appointed Chapter 7 trustee (the "Trustee") of the bankruptcy estate
24 of Executive Plastering, Inc.

25 2. I make this declaration upon personal knowledge.

26 3. I am competent to testify to the matters contained herein and would and could so
testify if called to do so before this Court.

4. I make this declaration under penalty of perjury, and in support of Motion for
Authority to Destroy Records and to Pay for Services Rendered Post-Petition (the
"Motion").

5. The Debtor commenced this case by filing a voluntary petition under Chapter 7 of

1 the Bankruptcy Code on December 21, 2009.

2 6. The Debtor and was in the business of construction.

3 7. I recovered 623 storage boxes (the "Records") containing pre-petition financial and
4 business records relating to the Debtor's business operations, which boxes have been stored
5 at a storage facility in the care of my counsel, Timothy S. Cory & Associates.

6 8. The Records have been reviewed and used to bring 26 adversary proceedings for
7 preference recoveries, which adversary proceedings have now all been resolved.

8 9. The cost for services of Assured Document Destruction to destroy the Records,
9 thereby preventing ongoing storage fees, is \$1411.00. See Exhibit A. Therefore, by the
10 Motion I am seeking authority to destroy the Records and to pay Assured Document
11 Destruction \$1411.00 for its post-petition services of destroying the Records.

12 Dated: December 29, 2014.

13
14 /s/ William A. Leonard, Jr.
15 WILLIAM A. LEONARD, JR.
16 Chapter 7 Trustee
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Timothy S. Cory & Associates and that on the 23rd day of December, 2014, I caused to be served a true and correct copy of the **DECLARATION OF WILLIAM A. LEONARD, JR. IN SUPPORT OF MOTION FOR AUTHORITY TO DESTROY RECORDS AND TO PAY FOR SERVICES RENDERED POST-PETITION** in the following manner:

☒ **a. Electronic Service**

Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☐ **b. United States Mail**

By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

☐ **c. Facsimile Transmission**

By facsimile to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written. No error was reported by the facsimile machine that I used.

☐ **d. Personal Service**

☐ For a party represented by an attorney, delivery was made by handing the documents to the attorney or by leaving the documents at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the documents in a conspicuous place in the office, on the date written above.

☐ For a party, delivery was made by handing the documents to the party or by leaving the documents at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there, on the date written above.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 29, 2014.

/s/ Suzanne Alexander
Suzanne Alexander
An Employee of Timothy S. Cory & Associates

EXHIBIT A

Sue Alexander

From: Vanda Milligan <vanda@shreddinglv.com>
Sent: Monday, December 22, 2014 11:30 AM
To: Timothy Cory
Subject: Assured Document Destruction

Good morning Time,

Thank you for using our instant quote feature on our website.

I wanted to make you aware that Storage facilities do not allow us to dispose of the empty boxes after we have shred on site. We send our box truck to remove them. There is an additional charge for box removal. It is 10% of the total bill. Since your 623 boxes will be \$1,283.00 the charge for box removal will be: \$128.00.

Lowest Price Guarantee

- We guarantee to be the lowest priced shredding vendor.
- If you get a lower quote for the same service, fax or email the proposal to us and we will beat your lowest offer by 10%.

Thank you again for choosing Assured document Destruction.

Merry Christmas and a Safe and Happy New Year to All!

Vanda

*Vanda Milligan
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Assured Document Destruction
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vanda@shreddinglv.com
www.shreddinglv.com
Watch our demo - Paper Shredding Demo | Assured Document Destruction Las Vegas*



Sue Alexander

From: Assured Document Destruction <sales@shreddinglv.com>
Sent: Monday, December 22, 2014 10:40 AM
To: Timothy Cory
Subject: Assured Document Destruction Quote

Hello Tim Cory:

Thank you for your quote request from Assured Document Destruction.

One Time Shred

of Small Boxes: 623

of Large Boxes: 0

Estimate: \$1,283.00

This above quote is for a One Time Shred, this quote is for on-site shredding of paper documents where all materials are shred in our truck before we leave your location. Please note that it is based on the service location being a business address (service at residential or rural locations is usually higher). Certain factors can contribute to a higher job price such as: inaccurate customer provided information, materials added to the original amount, difficult collection such as stairs or remote parking, as well as other factors that Assured Document Destruction cannot foresee. Drop-off service is available for small quantities (8 boxes / bags or less) and is priced @ \$10 per box. Larger drop off amounts will quoted per request.

Thank you for your interest, if you are ready to get started you can [send us an email](#) and we will call you back right away.

Sincerely,

The Assured Document Destruction Team
(702) 614-0001

www.shreddinglv.com

sales@shreddinglv.com

Watch our demo - [Paper Shredding Demo](#)